

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: _____)
SALEM HARBOR POWER DEVELOPMENT) Chapter 11
LP (f/k/a Footprint Power Salem Harbor) Case No. 22-10239 (MFW)
Development LP), *et al.*,¹) Jointly Administered
Reorganized Debtors.)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that the undersigned appear as counsel to Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) and its debtor affiliates as the reorganized debtors (the “Debtors”) and, pursuant to Fed. R. Bankr. P. 2002, 3017 and 9010(b), request that all notices given or required in this case, and all documents, and other papers served in this case, be given to and served upon:

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PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the rule specified above but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise, which affects the Debtors or the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) (1360); Salem Harbor Power FinCo, LP (f/k/a Footprint Power Salem Harbor FinCo, LP) (9219); and SH Power DevCo GP LLC (f/k/a Footprint Power SH DevCo GP LLC) (9008).

any other rights, claims, actions, defenses, setoffs, or recoupments to which the Debtors are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: May 17, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ *Jody C. Barillare*

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- and -

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Counsel to the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on this 17th day of May 2023, a true and correct copy of the foregoing *Notice of Appearance and Request for Service* was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Jody C. Barillare
Jody C. Barillare, Esq.